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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In Re:)
Generations on 1st, LLC,) Bankruptcy No.:
) 25-30002
Debtor, Jointly Administered)
(Main Case).) Chapter 11
-----)
-----)
-----)
In Re:) Bankruptcy No.:
Parkside Place, LLC,) 25-30003
)
) Chapter 11
Debtor, Jointly Administered.)
-----)
-----)
-----)
In Re:) Bankruptcy No.:
The Ruins, LLC,) 25-30004
)
) Chapter 11
Debtor.)

D E P O S I T I O N
OF
MULINDA CRAIG

DATE: Wednesday, September 24, 2025
PLACE: Vogel Law Firm
Fargo, North Dakota
BY: Charla A. Pawlik, RPR

<p>1 APPEARANCES 2 3 FOR THE DEBTORS: 4 The Dakota Bankruptcy Firm Attorneys at Law 5 1630 First Avenue North - Suite B Fargo, North Dakota 58102 6 By: Christianna Cathcart christianna@dakotabankruptcy.com 7 8 FOR JESSE CRAIG AND MULINDA CRAIG: 9 Schwab, Thompson & Frisk Attorneys at Law 10 820 34th Avenue East Suite 200 11 West Fargo, North Dakota 58078 By: Daniel J. Frisk 12 dan@stf.law 13 14 FOR RED RIVER STATE BANK: 15 Vogel Law Firm Attorneys at Law 16 218 NP Avenue P.O. Box 1389 17 Fargo, North Dakota 58107 By: Caren W. Stanley 18 cstanley@vogellaw.com 19 20 ALSO PRESENT: 21 Jesse Craig, Charles Aarestad and Danielle Harless 22 23 24 25</p>	<p>Page 2</p> <p>1 PROCEEDINGS 2 (Whereupon, the deposition of MULINDA 3 CRAIG commenced at 8:51 a.m. as follows:) 4 MULINDA CRAIG, 5 HAVING BEEN FIRST DULY SWORN TO TESTIFY THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT THE TRUTH, RELATIVE 6 TO THE CAUSE SPECIFIED, TESTIFIED AS FOLLOWS: 7 EXAMINATION 8 BY MS. STANLEY: 9 Q. Good morning. 10 A. Morning. 11 Q. Can you please state your full name for the court reporter? 12 A. It's Mulinda Craig, also known as Mindy 13 Craig. 14 Q. And how do you spell your first name 15 just -- 16 A. First name is spelled M-u-l-i-n-d-a. 17 Q. Okay. And where -- where are you from 18 originally? 19 A. Born in Wisconsin. 20 Q. Wisconsin. What part of Wisconsin? 21 A. Tomah. 22 Q. Okay. Did you graduate from high 23 school there? 24 A. Yes.</p>
<p>1 CONTENTS 2 WITNESS 3 PAGE 4 MULINDA CRAIG 5 Examination by Ms. Stanley 4 6 7 8 EXHIBITS 9 DEPOSITION EXHIBIT NO. MARKED 10 11 Exhibit 29 SBA Form 1919 Signed by Mulinda 47 12 Sue Craig dated 4-15-21 13 Exhibit 30 SBA Form 1919 Signed by Mulinda 52 14 Sue Craig dated 6-15-21 15 Exhibit 31 SBA Form 1919 Signed by Mulinda 54 16 Sue Craig dated 5-15-21 17 Exhibit 32 Check to Brady Punt dated 6-8-22 58 18 (FCCU Subpoena 669) 19 Exhibit 33 Check to Nichole Mathiasen 60 20 (FCCU Subpoena 665) 21 Exhibit 34 Check to Crown Jewels dated 67 22 6-29-22 (RRSB FCCU Subpoena 838) 23 24 25</p>	<p>Page 3</p> <p>1 Q. And what about -- how did you wind up 2 in this area of North Dakota, Minnesota? 3 A. My husband and I had some mutual 4 friends so we met through mutual friends back in 5 Wisconsin. And he was currently living in Fargo. I 6 was in Wisconsin. We decided to make a relationship 7 so... 8 Q. When -- 9 A. And -- 10 Q. -- about was that? 11 A. 2010. 12 Q. Okay. Did you graduate from college? 13 A. No. 14 Q. Okay. Did you do any -- did you 15 graduate from high school? 16 A. Yes. 17 Q. And that's Tomah? 18 A. Yes. 19 Q. Okay. What did you do after high 20 school? 21 A. I worked for my local family dentist as 22 a dental assistant. And in the interim I was on the 23 waiting list for a dental hygiene program that had 24 about a four-year-long wait list. 25 Q. Okay.</p>

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1 A. So I was doing my gen eds, taking some 2 just -- 3 Q. Where was -- 4 A. -- general classes. 5 Q. Where was that at? 6 A. In La Crosse, Wisconsin. 7 Q. How far is La Crosse from Tomah? 8 A. 45 minutes. 9 Q. Okay. Were you living in La Crosse 10 then? 11 A. No. I was in Tomah. 12 Q. Okay. So the -- what's the furthest 13 you have gone in -- in like educational background? 14 A. Like on the questionnaires and when -- 15 I put some college. 16 Q. Okay. And that was just like the 17 generals under -- 18 A. Yes. 19 Q. -- the initial -- 20 A. Yes. 21 Q. Okay. As your attorney earlier -- you 22 were here on Monday -- 23 A. Yes. 24 Q. -- for the depositions of Charles and 25 Danielle; correct?	Page 6 1 doing a great job. So he knew he needed to replace 2 her and I knew I needed a job anyway so it made sense 3 for me to take over that position. 4 Q. So the property management company is 5 Craig Properties? 6 A. Yes. 7 Q. Okay. And so that was -- that was open 8 and an existing company in 2010? 9 A. Yes. 10 Q. And how many -- at that time in 2010 11 how many employees did Craig Properties have? 12 A. Three I believe. Three. 13 Q. And then when you started working for 14 it did you become the fourth? 15 A. Nope. I -- he let the office manager 16 go and I took over her position. 17 Q. Okay. So stayed at three? 18 A. Yes. 19 Q. How long is it -- has it always been 20 like that number of employees or increased? 21 A. At Craig Properties? 22 Q. Yes. 23 A. It's kind of fluctuated a little bit. 24 I don't have a whole lot to do with Craig Properties 25 any longer so I -- I couldn't say how many true
1 A. Yes. 2 Q. Okay. So don't be offended, but I'm 3 going to ask you the same question of -- 4 A. Sure. 5 Q. -- are you under the influence this 6 morning of any alcohol or drugs? 7 A. No. 8 Q. Okay. And nothing that may impair your 9 ability to answer questions? 10 A. No. 11 Q. Okay. Can you tell me how old you are? 12 A. I am 38. 13 Q. Okay. That's always a sensitive 14 question. 15 A. Sorry. I had to think about it for a 16 second. The years all blur together really. 17 Q. So when you moved -- did you move up 18 here in 2010 you said? 19 A. Correct. 20 Q. Okay. And did you have -- find a job 21 when you moved up here or what did you -- what did 22 you start to do? 23 A. So Jesse had the property management 24 company. And he had a property manager that was 25 not -- or excuse me, an office manager that was not	Page 7 Page 9 1 employees versus independent contractors there are. 2 Q. Okay. When did you -- so explain to me 3 from 2010 till, you know, like now what your 4 involvement with Craig Properties was. 5 A. In 2014 we had our twins. And they 6 were micro-preemies born 15 weeks early so we spent 7 four and a half months in the NICU. And at that time 8 Jesse's oldest daughter knew that she would like to 9 take over the business at some point, kind of get her 10 feet wet a little bit more. So she took over my 11 position when I was focused on our twins. So that 12 was a good transition time for me to step away and 13 then she stepped in. 14 Q. In 2014? 15 A. 2014, yes. 16 Q. Okay. And then when did you start or 17 did CP Business Management come into existence? 18 A. CP Business Management would have been 19 2016 or 2017. Jesse had purchased a conglomerate of 20 all in one Coldwell Banker real estate, mortgage, 21 title, property management and commercial real estate 22 company. And then the property management side of 23 things wasn't doing the greatest. So he came to 24 me -- I was a stay-at-home mom. Came to me and asked 25 me if I would step in and help kind of turn things

<p style="text-align: right;">Page 10</p> <p>1 over is what I did.</p> <p>2 Q. So this was '16, '17?</p> <p>3 A. It would have been 2015. So we were</p> <p>4 still under Coldwell Banker's umbrella. And then --</p> <p>5 Q. Okay.</p> <p>6 A. -- 20 -- I believe it was 2015 or 2016</p> <p>7 we split off, renamed the property management company</p> <p>8 to CP Business Management.</p> <p>9 Q. What was it before that?</p> <p>10 A. I think it was just Coldwell Banker</p> <p>11 Property Management I believe.</p> <p>12 Q. Oh. So Craig Properties is separate</p> <p>13 from Coldwell Banker or CP -- what then became CP</p> <p>14 Business Management; is that right?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. Did you have any involvement</p> <p>17 with Craig Development?</p> <p>18 A. Minor.</p> <p>19 Q. So what -- what did you -- when you say</p> <p>20 minor, what do you mean by that? Can you expand a</p> <p>21 little?</p> <p>22 A. Well, Jesse and my's office is</p> <p>23 kitty-corner from each other. So at the beginning of</p> <p>24 Craig Development I really had no involvement. And</p> <p>25 then I would say probably the last four or five years</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Okay. Do you ever --</p> <p>2 A. So I have that stamp.</p> <p>3 Q. Are there different stamps or just one?</p> <p>4 A. This -- it's the same signature that</p> <p>5 the Fargo Rubber and Stamp made stamps of so it's the</p> <p>6 same swoops.</p> <p>7 Q. So -- I mean, and when I think of a</p> <p>8 stamp, right -- I'm old so I think a big hand -- you</p> <p>9 know, like you --</p> <p>10 A. Sure.</p> <p>11 Q. -- stamp it on -- on the paper. Is</p> <p>12 that -- do I have that right or am I --</p> <p>13 A. It's not the big handheld clunk-clunk</p> <p>14 one. It's the -- just a little like, yeah,</p> <p>15 3-inch-by-3-inch.</p> <p>16 Q. Okay.</p> <p>17 MR. FRISK: Get with the times, Caren.</p> <p>18 Q. (Ms. Stanley continuing) Is there more</p> <p>19 than one of --</p> <p>20 A. More than one stamp?</p> <p>21 Q. Yeah.</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And are they like allocated for</p> <p>24 different properties or...?</p> <p>25 A. No, it's -- well, since he's the signer</p>
<p style="text-align: right;">Page 11</p> <p>1 or so little random things pop up that he asks help</p> <p>2 on, needs help on.</p> <p>3 Q. Okay. So is it fair to say that you</p> <p>4 would only -- you don't work for Craig Development?</p> <p>5 A. Correct.</p> <p>6 Q. And is it fair to say you do not work</p> <p>7 for Craig Properties?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Do you have authority to write</p> <p>10 checks for Craig Development?</p> <p>11 A. I do not believe I do.</p> <p>12 Q. What about Craig Properties? Do you</p> <p>13 have authority to write checks for that one?</p> <p>14 A. Do not.</p> <p>15 Q. There was some discussion yesterday</p> <p>16 about Jesse has a stamp with -- for checks.</p> <p>17 A. Yeah.</p> <p>18 Q. Do you have access to that?</p> <p>19 A. I do.</p> <p>20 Q. Do you use it?</p> <p>21 A. Yes.</p> <p>22 Q. And what do you -- which entity do you</p> <p>23 use -- use it for?</p> <p>24 A. CP Business Management's checking is</p> <p>25 his signature.</p>	<p style="text-align: right;">Page 13</p> <p>1 on the CP Business Management checking account, all</p> <p>2 the checks get signed by him or that stamp.</p> <p>3 Q. Okay. And who else uses that stamp</p> <p>4 other than you?</p> <p>5 A. I have mine that I keep in my office.</p> <p>6 I believe he has one. And then Jordan I believe has</p> <p>7 one for Craig Properties.</p> <p>8 Q. Okay. Do you have access to online</p> <p>9 banking for Craig Properties?</p> <p>10 A. I do not.</p> <p>11 Q. What about do you have online banking</p> <p>12 access for Craig Development?</p> <p>13 A. I do not.</p> <p>14 Q. And then I'm guessing you do have it</p> <p>15 though for CP Business Management?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Are you an owner of CP Business</p> <p>18 Management?</p> <p>19 A. I am.</p> <p>20 Q. What is the percentage ownership?</p> <p>21 A. 50. 50-50.</p> <p>22 Q. With you and...?</p> <p>23 A. Jesse.</p> <p>24 Q. And when did that ownership percentage</p> <p>25 start?</p>

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1 A. I believe when we went through the name 2 change. The ownership changed from the Coldwell 3 Banker umbrella to the name change to me being an 4 owner. 5 Q. How many employees does CP Business 6 Management have currently? 7 A. Employees? One. Myself. 8 Q. So in the 2016, '17 time frame when it 9 became CP Business Management, how many employees 10 were there? 11 A. Five I believe. Five I believe. 12 Q. And then since that time maybe they 13 left or been terminated from the employment? 14 A. Correct. 15 Q. Okay. Did they voluntarily leave or 16 were they terminated? 17 A. All left voluntarily. Different 18 positions, life changes. 19 Q. How many office locations does CP have? 20 A. Two. 21 Q. And where are they? 22 A. Fargo and Watertown, South Dakota. 23 Q. How many -- in Fargo how many 24 properties does CP Business Management actually 25 manage?	Page 14 1 Lofts, then we have either a space to move into at 2 Generations on 1st or if The Ruins is completed, 3 there's a designated space in The Ruins to move into. 4 Q. What is -- can you just give me an 5 overview of what the IT, the technology setup is for 6 CP Business Management? 7 A. Can you be more specific? 8 Q. That's a fair question. Do you have 9 like your servers and -- and all of that, is that 10 in -- on site in Fargo or is that all in the cloud or 11 how is -- is there an IT company that manages it? 12 A. So we have -- majority of everything is 13 on a cloud. We have Chameleon Technologies who 14 handles the majority of our IT if we need. And then 15 -- or actually -- they get mad at me. I'm just 16 spewing. Our website is -- currently we're trying to 17 figure out how to reconfigure the CP Business 18 Management website. 19 Q. So -- 20 A. The company switched hands a few times 21 and now we don't have a contact at all. 22 Q. So -- Chameleon? 23 A. Yes. 24 Q. Are they based out of Fargo or are they 25 somewhere --
Page 15 1 A. There are... I believe there's nine 2 total in Fargo. 3 Q. Okay. What is the arrangement with the 4 nine in Fargo? Do they have to pay overhead for like 5 the CP Business Management office? Do they get 6 allocated a fee for that? 7 A. They do not. 8 Q. And what about in Watertown? Which 9 properties does CP Business Management manage? 10 A. Loft -- or sorry. Generations and 11 Parkside. 12 Q. Just those two? 13 A. Yes. 14 Q. And are Generations and Parkside 15 allocated an overhead for that office? 16 A. They are currently. 17 Q. So that's different than how it's -- 18 the arrangement for the Fargo properties? 19 A. Currently. 20 Q. Is there -- you said currently. Is 21 there plans to change that? 22 A. Correct. 23 Q. And what is -- are you going to get rid 24 of the Watertown office? 25 A. Yes. When the lease is up at The	Page 17 1 A. Originally it was out of Fargo, and now 2 he's remote and comes to Fargo quite often. 3 Q. Okay. Does CP Business Management 4 share its IT setup with Craig Development? 5 MR. FRISK: What do you mean by setup? 6 THE WITNESS: Yeah. 7 Q. (Ms. Stanley continuing) Like your 8 email system. 9 A. No. Those are separate. We've got two 10 different -- 11 Q. -- email servers? 12 A. Yes. 13 Q. So like what is your email? 14 A. Mcraig@cpbusmgt.com. 15 Q. And what would Jesse's email be? 16 A. Jcraig@craigprop.com. 17 Q. Do you have a craigprop.com email? 18 A. I do not. 19 Q. You indicated earlier that your offices 20 are close to each other though. 21 A. Yes. 22 Q. Like physically within 10 feet? 23 A. Give or take, yes. 24 Q. Okay. Earlier Jesse had indicated that 25 he was not tech savvy. Would you agree with that

<p style="text-align: right;">Page 18</p> <p>1 characterization?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Do you assist him in -- assist</p> <p>4 him with technology matters? Let's say that.</p> <p>5 A. Some, yes.</p> <p>6 Q. So like what would he need assistance</p> <p>7 with or what do you help him with?</p> <p>8 A. Things that come to my mind right now</p> <p>9 are getting columns to tabulate in Excel. The</p> <p>10 printer wasn't feeding paper correctly and printing</p> <p>11 correctly so changing the settings for that. And</p> <p>12 recently our software for the property management</p> <p>13 accounting software just changed how they do their</p> <p>14 logins. And now it's a code that gets sent to your</p> <p>15 phone every --</p> <p>16 Q. Oh.</p> <p>17 A. -- so often, and that wasn't working.</p> <p>18 I guess stuff like that.</p> <p>19 Q. Do you ever assist him with -- so you</p> <p>20 said Excel spreadsheets, you have helped with Excel</p> <p>21 spreadsheets.</p> <p>22 A. Yes.</p> <p>23 Q. Do you input data for him into Excel</p> <p>24 spreadsheets?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 20</p> <p>1 don't have any banking access for Craig Development;</p> <p>2 correct?</p> <p>3 A. Correct.</p> <p>4 Q. And what about -- and you don't have it</p> <p>5 also for Craig Properties?</p> <p>6 A. Correct.</p> <p>7 Q. Would there be any reason that Craig</p> <p>8 Properties would pay you money directly?</p> <p>9 MR. FRISK: Objection to form.</p> <p>10 THE WITNESS: Yeah.</p> <p>11 MR. FRISK: Calls for speculation. If</p> <p>12 you want to give her an example of what it was, she</p> <p>13 probably could answer.</p> <p>14 Q. (Ms. Stanley continuing) If I -- I</p> <p>15 don't have the bank statements in front of me, but if</p> <p>16 there are, you know, cash payments or monthly</p> <p>17 payments to Mindy Craig, what would the reason for</p> <p>18 that be?</p> <p>19 A. From Craig Properties? What's the time</p> <p>20 frame you are talking?</p> <p>21 Q. Bank statements were provided from</p> <p>22 2021 -- 20 -- 2021 to current.</p> <p>23 A. And there's monthly checks?</p> <p>24 Q. Not monthly but fairly regularly.</p> <p>25 MR. FRISK: I'm going to object on the</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. Do you know if Jordan helps him with</p> <p>2 that?</p> <p>3 A. That I could not answer.</p> <p>4 Q. What is your understanding of Jordan's</p> <p>5 role with respect to CP Development?</p> <p>6 A. CP Development?</p> <p>7 Q. Right.</p> <p>8 MR. FRISK: There's no such thing as --</p> <p>9 THE WITNESS: Yeah.</p> <p>10 MR. FRISK: -- CP Development.</p> <p>11 Q. (Ms. Stanley continuing) Or I'm sorry.</p> <p>12 Craig Development. My bad. Apologies.</p> <p>13 A. Well, as Jesse testified yesterday, she</p> <p>14 wanted to step into the development side of things,</p> <p>15 and then she wanted to focus on having a family so</p> <p>16 then she's strictly doing property management things.</p> <p>17 Q. For CP -- or sorry, Craig Properties?</p> <p>18 A. Yes.</p> <p>19 Q. So Jordan only works for Craig</p> <p>20 Properties at this point?</p> <p>21 A. To my knowledge, yes.</p> <p>22 Q. Okay. Does she work for CP Business</p> <p>23 Management?</p> <p>24 A. She does not.</p> <p>25 Q. Do you -- so you indicated earlier you</p>	<p style="text-align: right;">Page 21</p> <p>1 form again. You're just asking her ambiguous and</p> <p>2 vague time periods. Again if you had a specific</p> <p>3 dollar amount, she could answer it. And the other</p> <p>4 objection's on speculative. She's going to have to</p> <p>5 speculate as to what you mean by timing and what</p> <p>6 payments are.</p> <p>7 Q. (Ms. Stanley continuing) Do you ever</p> <p>8 get paid money from Craig Properties in the last</p> <p>9 three years?</p> <p>10 MR. FRISK: And again I'll -- same</p> <p>11 objection as to form.</p> <p>12 A. Not that I recall off the top of my</p> <p>13 head.</p> <p>14 Q. (Ms. Stanley continuing) Does Craig</p> <p>15 Properties owe you any money in the last three years?</p> <p>16 A. No.</p> <p>17 Q. Do you know if Craig Properties is</p> <p>18 used to pay -- Craig Properties funds is used to pay</p> <p>19 personal expenses for the family?</p> <p>20 MR. FRISK: Objection as to form.</p> <p>21 Again she's already testified that she doesn't</p> <p>22 know -- she doesn't have a banking relationship with</p> <p>23 Craig Properties. She --</p> <p>24 MS. STANLEY: She -- she was here</p> <p>25 yesterday though when he indicated that the mortgage</p>

<p>1 for the house is paid from that.</p> <p>2 MR. FRISK: Well, do you want her to</p> <p>3 testify as to what she knows from yesterday?</p> <p>4 MS. STANLEY: She was here.</p> <p>5 MR. FRISK: So to the extent you were</p> <p>6 here yesterday, Mindy, and heard that, you can answer</p> <p>7 if you recall. I'm going to object to the form</p> <p>8 again.</p> <p>9 MS. STANLEY: That's fine.</p> <p>10 MR. FRISK: I mean, if we have certain</p> <p>11 dollar amounts, it's going to go on -- and it's</p> <p>12 already been asked and answered by Jesse Craig. He's</p> <p>13 the one who testified that he pays the mortgage</p> <p>14 sometimes out of this --</p> <p>15 Q. (Ms. Stanley continuing) And I'm</p> <p>16 asking, are you aware of any family household</p> <p>17 expenses paid in the last three years out of the</p> <p>18 Craig Properties --</p> <p>19 MR. FRISK: Again I'll --</p> <p>20 Q. -- bank account?</p> <p>21 MR. FRISK: -- still object as to form.</p> <p>22 And, Mindy, if you remember from yesterday's</p> <p>23 deposition, you can answer to the extent you</p> <p>24 remember.</p> <p>25 A. I... Short answer I think to clear up</p>	<p>Page 22</p> <p>1 Q. Okay. What -- what -- how many</p> <p>2 vehicles do you -- do you have?</p> <p>3 A. I personally have two.</p> <p>4 Q. How many does Jesse have?</p> <p>5 MR. FRISK: Objection as to form. It's</p> <p>6 calling for speculation. You can answer if you know.</p> <p>7 A. I -- truly I couldn't tell you off the</p> <p>8 top of my head. He's got a couple older vehicles.</p> <p>9 There's vehicles that employees of -- or contractors</p> <p>10 of Craig Properties drives. I don't know what all is</p> <p>11 considered personal, what all is considered business</p> <p>12 or where the cutoffs are. I don't know how those are</p> <p>13 all situated.</p> <p>14 Q. So you have your own personal account,</p> <p>15 checking account?</p> <p>16 A. Yes.</p> <p>17 Q. And then your -- you have control of</p> <p>18 the CP Business Management bank account at Starion;</p> <p>19 right?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. And I did receive the Starion</p> <p>22 Bank statements from you --</p> <p>23 A. Uh-huh.</p> <p>24 Q. -- so thank you. I'm curious about --</p> <p>25 there were monthly checks for \$1,500 that were</p>	
<p>1 any confusion is our finances are kept separate.</p> <p>2 Personal are kept separate. We don't have any</p> <p>3 crossover. And that's how it's always been our</p> <p>4 entire marriage, our entire relationship. So if</p> <p>5 there are personal expenses paid out of XYZ account,</p> <p>6 I wouldn't be able to attest either way. As Dan</p> <p>7 said, Jesse made the comment yesterday, yes, mortgage</p> <p>8 was paid out.</p> <p>9 Q. (Ms. Stanley continuing) In the last</p> <p>10 three years what -- has Craig Properties paid for any</p> <p>11 of your vehicles?</p> <p>12 A. That I do not -- I don't know what</p> <p>13 account car payments come out of.</p> <p>14 Q. For the car that you drive you don't</p> <p>15 know?</p> <p>16 A. The car that I drive comes out of my</p> <p>17 checking account.</p> <p>18 Q. Okay. Where's your checking account?</p> <p>19 A. Altra. Which you have the bank</p> <p>20 statements for.</p> <p>21 Q. Is that the one in Wisconsin?</p> <p>22 A. Yes.</p> <p>23 Q. And it's a -- is Altra with an A or a</p> <p>24 U?</p> <p>25 A. A.</p>	<p>Page 23</p> <p>1 redacted.</p> <p>2 A. Yes.</p> <p>3 Q. Can you tell me why they were redacted</p> <p>4 and what was --</p> <p>5 A. They are for outside owners that have</p> <p>6 nothing to do with this case for people that I manage</p> <p>7 for.</p> <p>8 Q. So they're owners of properties that</p> <p>9 you manage for?</p> <p>10 A. Yes.</p> <p>11 Q. And they get \$1,500 a month?</p> <p>12 A. Currently.</p> <p>13 Q. Okay.</p> <p>14 A. I think it might have changed a little</p> <p>15 bit over the years.</p> <p>16 Q. That is Goff?</p> <p>17 A. Yeah.</p> <p>18 MR. FRISK: Well, I'm going to -- hang</p> <p>19 on a second. I'm going to object as to form. That</p> <p>20 is what?</p> <p>21 MS. STANLEY: Goff --</p> <p>22 MR. FRISK: Goff.</p> <p>23 MS. STANLEY: -- is the last name.</p> <p>24 MR. FRISK: Right. I think that the</p> <p>25 design there is she has outside business interests;</p>	<p>Page 25</p>

<p style="text-align: right;">Page 26</p> <p>1 right? She manages apartments and properties for 2 other people. I don't know that we want to -- unless 3 it relates to Craig let's not throw those names 4 around. She is taking steps to make sure that 5 they're not disclosed while being -- that would 6 affect her ability to make her outside income. She 7 doesn't rely solely on Jesse's apartments. She runs 8 other apartments.</p> <p>9 Q. (Ms. Stanley continuing) Okay. Do you 10 have an interest in Prevail, LLC?</p> <p>11 A. I do not.</p> <p>12 Q. Did you ever do any work for Prevail, 13 LLC?</p> <p>14 A. Did not.</p> <p>15 Q. Had any ownership in it?</p> <p>16 A. No.</p> <p>17 Q. What about Prevail Realty, LLC?</p> <p>18 A. That was set up. Nothing ever ran 19 through there to my knowledge.</p> <p>20 Q. You mean like it never had any business 21 or --</p> <p>22 A. I don't believe so.</p> <p>23 Q. Do you have a real estate agent 24 license?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 28</p> <p>1 Like anybody else involved in that?</p> <p>2 MR. FRISK: Objection. Form and 3 relevancy.</p> <p>4 A. Jesse Kiihl has his South Dakota 5 license so he was going to also work under Prevail 6 Realty. And I believe there was another gal in 7 Watertown that was working on getting her license and 8 her plan was also to work under Prevail Realty, but I 9 was already under a different brokerage.</p> <p>10 Q. Which brokerage?</p> <p>11 A. Mainstream Realty.</p> <p>12 Q. Okay. You ever have to take any ethics 13 classes as -- to get your real estate license?</p> <p>14 A. Yes.</p> <p>15 Q. Ever take any classes on mortgage 16 fraud?</p> <p>17 A. I don't believe on mortgage fraud.</p> <p>18 Q. Okay. Jesse Kiihl was the property -- 19 I'm sorry, project manager for Parkside, Generations 20 and The Ruins; correct?</p> <p>21 A. Yes.</p> <p>22 Q. Did you work with him on those projects 23 at all?</p> <p>24 MR. FRISK: Objection as to form.</p> <p>25 Which projects are you talking about?</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. Did you ever take classes or anything 2 towards obtaining one?</p> <p>3 A. Yes.</p> <p>4 Q. You just didn't -- did you -- you just 5 didn't finish?</p> <p>6 A. I did have a license. I do not 7 currently hold my license.</p> <p>8 Q. Okay. When did you get the license?</p> <p>9 A. 2016 I believe, maybe '17.</p> <p>10 Q. And did you just let it lapse?</p> <p>11 A. I did.</p> <p>12 Q. When did that happen?</p> <p>13 A. This last -- 2020... End of 2024 it 14 would have lapsed.</p> <p>15 Q. And were you -- as part of Prevail 16 Realty what did you -- what did you do for that? I 17 mean, I saw that there was a podcast or something or 18 a -- or a business advertisement for it; is that 19 right?</p> <p>20 A. What kind of business advertisement I 21 guess?</p> <p>22 Q. I thought you went on the TV or the 23 radio or something talking about Prevail Realty.</p> <p>24 A. Not that I recall.</p> <p>25 Q. Who did you work with for Prevail?</p>	<p style="text-align: right;">Page 29</p> <p>1 MS. STANLEY: Parkside, Generations and 2 Ruins.</p> <p>3 A. As far as Jesse Kiihl and his 4 project --</p> <p>5 MR. FRISK: Hang on a second. She's 6 pretty -- she testified she works for CP Business 7 Management. To the extent she worked for these 8 entities or what are you --</p> <p>9 MS. STANLEY: I mean, they have 10 disclosed emails where she's emailing with Jesse 11 Kiihl.</p> <p>12 MR. FRISK: On the real -- on this 13 real estate agency thing or on -- as a --</p> <p>14 MS. STANLEY: On the -- on The Ruins --</p> <p>15 MR. FRISK: Projects?</p> <p>16 MS. STANLEY: -- the three Watertown 17 projects, yes.</p> <p>18 MR. FRISK: During construction or 19 after -- after they've been opened?</p> <p>20 MS. STANLEY: I -- I think --</p> <p>21 MR. FRISK: She managed them after they 22 were opened.</p> <p>23 MS. STANLEY: I believe that they were 24 during the construction phase --</p> <p>25 MR. FRISK: Okay.</p>

Page 30	Page 31	Page 33
<p>1 MS. STANLEY: -- so I would like to ask 2 her that question.</p> <p>3 MR. FRISK: Perfect. But just identify 4 whether it's construction or ownership 'cause she -- 5 or construction or operations.</p> <p>6 Q. (Ms. Stanley continuing) So do you 7 recall having communications by email with Jesse 8 Kiihl?</p> <p>9 A. Yes.</p> <p>10 Q. And was it -- what do you recall about 11 those email communications?</p> <p>12 A. We -- majority was regarding the Knox 13 Boxes for the properties.</p> <p>14 Q. The what boxes?</p> <p>15 A. Knox Boxes.</p> <p>16 Q. What's a Knox Box?</p> <p>17 A. They are the fire department -- you 18 have to have them -- you have to have a form 19 submitted to you by the fire department giving 20 them -- giving you the authority to order the Knox 21 Box which is keyed to their municipal key or their 22 fire department key if there's ever an emergency --</p> <p>23 Q. Uh-huh.</p> <p>24 A. -- so the fire department is the only 25 one that ever has access to that box.</p>		<p>1 Q. To the state of South Dakota?</p> <p>2 A. Yes.</p> <p>3 Q. Is this something you did monthly?</p> <p>4 A. Yes.</p> <p>5 Q. For all three of the projects?</p> <p>6 A. Yes.</p> <p>7 Q. So any other -- but you didn't actually 8 pay it; is that what you're saying?</p> <p>9 A. Correct.</p> <p>10 Q. Or pay it through Craig Development or 11 through Craig Properties?</p> <p>12 A. No. Yes, correct, I did not pay that.</p> <p>13 Q. So did you just have to tell Jesse he 14 needs to pay this?</p> <p>15 A. He would tell me the amount that needed 16 to be reported and that's what I would do.</p> <p>17 Q. So you would just do the reporting of 18 the amounts?</p> <p>19 A. Correct.</p> <p>20 Q. And had nothing to do with any payments 21 remitted to the state?</p> <p>22 A. Correct.</p> <p>23 MR. FRISK: Well, I'm going to object 24 because it mischaracterizes the -- the answer. I 25 think what she's getting at is that she would get a</p>
	Page 31	Page 33
<p>1 Q. Is that the only thing you ever really 2 recall talking to him about on the three Watertown 3 projects?</p> <p>4 A. There may have been a -- I don't know 5 if there's an email about it -- a phone call about -- 6 we had a roof leak at Generations he looked at.</p> <p>7 Q. So this would have been after it was 8 constructed --</p> <p>9 A. Yes.</p> <p>10 Q. -- and there's tenants?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Did you pay any -- take 13 responsibility for paying during the construction 14 phase excise taxes for the three Watertown projects?</p> <p>15 A. No.</p> <p>16 Q. So you don't know if -- if -- have any 17 knowledge about paying taxes on Parkside, Generations 18 or The Ruins?</p> <p>19 A. I submitted the pay -- or the -- not 20 the pay request. The amount that was owed. But that 21 is the extent of -- I didn't make any payments to --</p> <p>22 Q. So like --</p> <p>23 A. -- for excise tax.</p> <p>24 Q. -- a reporting thing?</p> <p>25 A. Yes.</p>		<p>1 number from Jesse and put it on a form. I don't want 2 there to be a misconstrue that -- misconstrued that 3 she's doing the calculation.</p> <p>4 MS. STANLEY: No. No. Just -- I 5 believe he said she made the payments but...</p> <p>6 MR. FRISK: He would give her a number 7 and she would make the payment?</p> <p>8 MS. STANLEY: I think that's what he 9 testified to yesterday, but we'll have to look at the 10 transcript when it comes out. So I just wanted to 11 clarify that though.</p> <p>12 Q. (Ms. Stanley continuing) Is there any 13 other clerical work like that -- I don't know. 14 That's probably a bad term for that, clerical work. 15 But that you can think of that you would do on behalf 16 of those three projects?</p> <p>17 A. Yes, I think that's a fair statement.</p> <p>18 Q. That there is or there isn't?</p> <p>19 A. There is not.</p> <p>20 Q. Okay. None that you can think of 21 anyway?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Did you ever deal with in 24 respect to The Ruins any of the subcontractors such 25 as if they're sending in paperwork or invoices?</p>

1 MR. FRISK: I'm going to object as to 2 form just 'cause that's really broad. 3 Q. (Ms. Stanley continuing) Did you ever 4 receive and look at paperwork from subcontractors on 5 The Ruins when it was being constructed? 6 A. In terms of like what was submitted for 7 draw requests or what? 8 Q. Sure. 9 A. No. 10 Q. Had no involvement with the draw 11 requests at all? 12 A. No. 13 Q. No -- 14 A. I take that back. I did have to send 15 Charles -- Jesse was out of town one time, and I had 16 to scan something in and send it to Charles. It was 17 the first time I had ever done that. And I think 18 there's even an email saying: I hope I did this 19 right 'cause I don't know what I'm doing. 20 Q. So how would the invoices come into the 21 office? Would they like just have his name on and 22 they go on his desk or...? 23 A. I could not -- I didn't see any 24 invoices. I don't receive the mail. So if they came 25 in by mail, I wouldn't have any idea. If they came	Page 34 1 time so I don't want you to misconstrue that as she 2 reviewed a draw request and sent it to -- to Charles. 3 She didn't review it. She merely -- I meant scanned 4 it. Nobody faxes anymore. 5 Q. (Ms. Stanley continuing) So tell me 6 about this spreadsheet. I know -- I know what you're 7 referencing and I can't -- 8 A. Yeah, it was like the -- similar to 9 what the big -- the one that had all the yellow -- 10 Q. Okay. 11 A. -- things on it. 12 Q. I think that was 24 -- Exhibit 24 or 25 13 from yesterday. 14 A. Okay. So -- well, in that scope of 15 things there would have been some extra tabs I 16 believe at some point or another that had a 17 running -- 18 Q. These ones -- 19 A. Yes. 20 Q. -- Exhibits 24 and 25? I think this is 21 the one with the yellow, is 25; right? 22 A. Yeah. So I think like here at some 23 point would have been like the running totals of -- 24 Q. Of the -- 25 A. -- each line.
Page 35 1 in by email, I wouldn't have any idea. 2 Q. Okay. 3 A. If they came in person, I wouldn't have 4 any idea. 5 Q. And so when there would be unpaid 6 contractors, did you ever take any calls from unpaid 7 contractors regarding these three projects? 8 A. Did not. 9 Q. So you never -- are you testifying you 10 never reviewed any of the draw requests before they 11 were submitted other than that one you just 12 referenced with Charles? 13 A. Every now and again Jesse would need 14 help tabulating the tabs at the bottom, but that is 15 about the extent of it. 16 Q. What do you mean, the tabs at the 17 bottom? 18 A. He -- well, he testified yesterday he 19 kept a -- the big sheet of paper. 20 MR. FRISK: And I want to make an 21 objection. Again it mischaracterizes her testimony. 22 She didn't -- she said she did not review the draw 23 requests. Caren, you said -- suggested she did 24 review the draw requests. Her conduct was limited to 25 faxing a piece of paper or something to Charles one	Page 35 Page 37 1 Q. Okay. 2 A. And for whatever reason sometimes those 3 would not calculate across or down so I'd need to do 4 that -- 5 Q. So just -- 6 A. -- or help him with that. 7 Q. -- help with the Excel skills? 8 A. Yes. 9 Q. Okay. Which that's fair 'cause I need 10 that help all the time as well. Did you ever have 11 any -- assist Jesse with altering invoices? 12 A. No. 13 Q. Did you -- he testified yesterday about 14 financial statements and that there was a financial 15 statement that had a bank account altered. Did you 16 assist with that? 17 MR. FRISK: I object as to form. I 18 think -- the term altered. I think the account 19 number was redacted. 20 MS. STANLEY: No, I believe he said he 21 switched two of the numbers. 22 MR. FRISK: In an effort to redact it, 23 right. You -- you can ask her the question. I'm 24 just going to note my objection on there -- 25 MS. STANLEY: Sure.

Page 38	Page 39	Page 41
1 MR. FRISK: -- as to form.	1 Q. Okay.	1 Q. Okay.
2 MS. STANLEY: I think you have done		2 MR. FRISK: Wait. This is Exhibit 17.
3 that.		3 MS. STANLEY: 18. I'm -- this is 16.
4 Q. So --		4 MR. FRISK: Oh, 16.
5 MR. FRISK: And you can answer to the		5 THE WITNESS: 16.
6 extent you independently recall.		6 MR. FRISK: Which one did you want?
7 A. I have no knowledge of that.		7 MS. STANLEY: Oh.
8 Q. So no knowledge --		8 MR. FRISK: 17 or 16?
9 A. Other than what was said yesterday.		9 MS. STANLEY: That says Parkside. I
10 Q. Okay. So you did not assist him in --		10 want the one that says Mulinda Notes. 17. My
11 MR. FRISK: Asked and answered.		11 apologies. Sorry.
12 Q. -- moving numbers around on financial		12 MR. FRISK: I don't mean to lord over
13 statements; is that correct?		13 you but...
14 A. Correct.		14 THE WITNESS: No, that's fine.
15 Q. And you had no knowledge that he had		15 MS. STANLEY: Now we got them all
16 done this?		16 messed up too.
17 A. No.		17 (Off the record.)
18 Q. Did you ever assist with gathering		18 A. Okay.
19 documents for financial statements for...?		19 Q. Is this the first time you have seen
20 A. Other than if he asked for like a		20 Exhibit 17?
21 balance sheet or something, that most likely would		21 A. In its entirety, yes.
22 have been the extent of it.		22 Q. So you just saw parts of it?
23 Q. Do you do the bookkeeping for CP		23 A. I had seen that it was attached to an
24 Business Management?		24 email. I have not specifically gone through it.
25 A. CP Business Management, yes.		25 Q. Okay. If you look at Exhibit 1-A which
Page 39		
1 Q. Do -- you don't do the -- do you do the	1 is page 1 of -- there you go -- 1 of 56, are you	1 is page 1 of -- there you go -- 1 of 56, are you
2 bookkeeping though for Craig Properties?	2 familiar with this promissory note in the sum of	2 familiar with this promissory note in the sum of
3 A. No.	3 3 1,477,500?	3 3 1,477,500?
4 Q. Who does; do you know?	4 A. I am to the extent that it's been	4 A. I am to the extent that it's been
5 A. I wouldn't be able to specifically say.	5 supplied to attorneys over the last two years.	5 supplied to attorneys over the last two years.
6 I think --	6 Q. Is that your signature on page 3 of the	6 Q. Is that your signature on page 3 of the
7 MR. FRISK: Objection as to form.	7 promissory note? Oh, you went one page too far.	7 promissory note? Oh, you went one page too far.
8 Answer only if you know. Don't speculate.	8 A. Appears to be.	8 A. Appears to be.
9 A. No.	9 Q. Do you recall signing this note?	9 Q. Do you recall signing this note?
10 MR. FRISK: And then slow it down	10 A. I do not.	10 A. I do not.
11 because I'm slow. I can't think of objections fast.	11 Q. You don't recall signing this?	11 Q. You don't recall signing this?
12 I'm like the slowest guy in the world now.	12 A. This one I do not.	12 A. This one I do not.
13 THE WITNESS: Okay.	13 Q. Do you recall signing any others?	13 Q. Do you recall signing any others?
14 MR. FRISK: So before you answer give	14 A. Yes. I remember signing a	14 A. Yes. I remember signing a
15 me a chance to at least think about it for a second.	15 approximately 400-and-some-change-thousand-dollar	15 approximately 400-and-some-change-thousand-dollar
16 THE WITNESS: Okay.	16 note and a \$600,000-and-some-change note prior to all	16 note and a \$600,000-and-some-change note prior to all
17 MR. FRISK: Thank you.	17 these that are in this exhibit.	17 these that are in this exhibit.
18 Q. (Ms. Stanley continuing) Have you	18 Q. So these -- this Exhibit 1-A is dated	18 Q. So these -- this Exhibit 1-A is dated
19 reviewed what's Exhibit 17 from yesterday which --	19 2021.	19 2021.
20 what's that one?	20 A. Correct.	20 A. Correct.
21 A. 18.	21 Q. You're saying you signed a 400 and a	21 Q. You're saying you signed a 400 and a
22 Q. Oh, it must be this one. This is the	22 \$600,000 one prior to this?	22 \$600,000 one prior to this?
23 declaration of Charles Aarestad. Re: The Mulinda	23 A. Yes. And not \$400,000 even and	23 A. Yes. And not \$400,000 even and
24 Notes.	24 \$600,000 even. It was odd numbers.	24 \$600,000 even. It was odd numbers.
25 A. No, I have not reviewed them.	25 Q. Sure. Sure. Are you saying this note	25 Q. Sure. Sure. Are you saying this note

<p>1 was fraudulently obtained in your name?</p> <p>2 MR. FRISK: Object. Objection as to</p> <p>3 form. That calls for a legal conclusion. You can</p> <p>4 answer as a layperson to the extent you know</p> <p>5 anything.</p> <p>6 A. I very vividly and very specifically</p> <p>7 for whatever reason remember the 400 and \$600,000</p> <p>8 note. And when the notice of default I believe came</p> <p>9 out in 2024 --</p> <p>10 Q. The one from me do you mean?</p> <p>11 A. Yes. I was extremely shocked at the</p> <p>12 amounts for me. I do not recall signing these. I</p> <p>13 have racked my brain trying to think of what in the</p> <p>14 world, where was I, when did this happen.</p> <p>15 MR. FRISK: We'll just note that when</p> <p>16 she said "these," she's pointing --</p> <p>17 THE WITNESS: The -- the --</p> <p>18 MR. FRISK: -- to --</p> <p>19 THE WITNESS: -- three in front of me</p> <p>20 in Exhibit --</p> <p>21 MR. FRISK: Which are Exhibits...?</p> <p>22 THE WITNESS: 1-A, 2-A, 3-A.</p> <p>23 Q. (Ms. Stanley continuing) So do you have</p> <p>24 any -- would you have ever had conversations with</p> <p>25 Martin Peterson?</p>	<p>Page 42</p> <p>1 I were from real estate matters. He was helping a</p> <p>2 person get a loan for buying some multi-family,</p> <p>3 single-family homes.</p> <p>4 Q. Do you recall -- what was the PPP loan</p> <p>5 for, what entity?</p> <p>6 A. Mindy Craig Photography, and CP</p> <p>7 Business Management I believe also applied for that.</p> <p>8 Q. Do you -- at the time you had a</p> <p>9 photography business?</p> <p>10 A. Yes. Still do.</p> <p>11 Q. You still do?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Okay. Is it just you as an employee?</p> <p>14 A. Correct.</p> <p>15 Q. If you look at Exhibit 1-B, this is for</p> <p>16 the \$1.477 million loan, and that's the one that we</p> <p>17 referred to as the First Mulinda Note.</p> <p>18 A. Uh-huh.</p> <p>19 Q. Do you see the disbursements in the</p> <p>20 middle there? It indicates that there's a lot of --</p> <p>21 several cashier's checks --</p> <p>22 A. I do see that.</p> <p>23 Q. -- to Craig Development. Do you have</p> <p>24 any recollection of these?</p> <p>25 A. I do not.</p>
<p>1 A. I did, yes.</p> <p>2 Q. And was it during this time frame?</p> <p>3 A. Yes.</p> <p>4 Q. And what do you recall of those</p> <p>5 communications?</p> <p>6 A. We were working on a SBA loan. He had</p> <p>7 brought that to our attention. When I say "our," I</p> <p>8 mean mine and Jesse's. Was working on -- so the SBA</p> <p>9 was the EIDL and the PPP. Those were two different</p> <p>10 loans that he brought to our attention.</p> <p>11 Q. So that was right during COVID --</p> <p>12 A. Yeah --</p> <p>13 Q. -- is that right?</p> <p>14 A. -- it was at the end or mid 2020 if I</p> <p>15 remember correctly. Maybe the end. And then the 400</p> <p>16 and the \$600,000 notes were -- I don't recall the</p> <p>17 dates on those exactly, but I just remember he came</p> <p>18 into the office and said: I need your signatures.</p> <p>19 This is super short term. It will be wrapped up into</p> <p>20 permanent financing. And --</p> <p>21 Q. For the 400 and the 600?</p> <p>22 A. Yes.</p> <p>23 Q. Okay.</p> <p>24 A. And I -- like I said, I don't recall</p> <p>25 these ones. Any other communications with Martin and</p>	<p>Page 43</p> <p>1 Q. Any reason to dispute that these checks</p> <p>2 were issued to Craig Development?</p> <p>3 A. I -- I would not be able to answer that</p> <p>4 'cause I don't -- these don't look familiar to me.</p> <p>5 Q. Okay. Do you have any reason to think</p> <p>6 anyone forged your signature on that document?</p> <p>7 A. It looks like my signature. I -- like</p> <p>8 I said, I have racked my brain trying to remember</p> <p>9 meeting with Martin, seeing Martin. With these large</p> <p>10 dollar amounts I certainly would believe that</p> <p>11 something that large would stick out, but as far as</p> <p>12 forging I -- I don't know.</p> <p>13 Q. Have you asked Jesse if he forged your</p> <p>14 signature on these documents?</p> <p>15 A. Specifically, no.</p> <p>16 Q. Have you asked Jesse how these -- if he</p> <p>17 recalls how these loans came about?</p> <p>18 A. There was roundtable discussion I</p> <p>19 guess, and it was that more or less it was supposed</p> <p>20 to have been rolled into permanent financing. And</p> <p>21 that's about the extent of anything, the conversation</p> <p>22 went.</p> <p>23 Q. And when you say roundtable discussion,</p> <p>24 what do you mean by that?</p> <p>25 A. It was: Where did these amounts come</p>

Page 46	Page 48
1 from? I don't remember signing these. I thought I 2 had a 400 and a 600? And he just said: I thought 3 those were taken care of in permanent financing. 4 Q. So did he acknowledge to you though 5 that the note -- or that those loans had been issued? 6 A. Yes. 7 MR. FRISK: Well, I'm going to -- 8 mischaracterizes the testimony. When you say -- 9 MS. STANLEY: She said "yes" so... 10 MR. FRISK: Okay. Well, but she also 11 testified that -- that she didn't know anything about 12 that and she thought that they had gone into 13 permanent financing so... 14 MS. STANLEY: Okay. Let's -- what time 15 is it? 16 THE WITNESS: 9:42. 17 MS. STANLEY: Okay. 18 MR. FRISK: I have 10:30. And I can 19 run over to court and be back. So if we can go to 20 10:30 -- 10:25, take my break, I'll run over to court 21 and I will run up to the clerk and tell her to get me 22 in right away. It's just a pretrial, setting it for 23 trial. 24 MS. STANLEY: Yeah. Okay. Let me -- 25 let me take like a five-minute --	1 MR. FRISK: I'll just share. 2 Q. (Ms. Stanley continuing) Okay. If you 3 look -- let me find the page for you, if that's okay. 4 A. Yeah. Oh, I'm sorry. 5 Q. Yeah. No, no. 6 MS. CATHCART: What page is that? 7 MS. STANLEY: It's kind of in the 8 middle and it says page 1. These forms are always 9 interesting. Wait a minute. Do you start out 10 page -- at the beginning page 2 and then it's a 11 \$1.477 million loan or are the pages all mixed up? 12 Look at the second -- no, no, you're only front. 13 Second page. 14 MR. FRISK: She's looking. 15 MS. STANLEY: Is that a 1.477...? 16 MS. CATHCART: Yeah. 17 MS. STANLEY: Okay. So let's look at 18 that. 19 MS. CATHCART: So page 2? 20 MS. STANLEY: Yes. 21 Q. (Ms. Stanley continuing) Are you 22 familiar with having made an SBA loan application for 23 this sum of money with Martin -- the assistance of 24 Martin Peterson? 25 A. I believe that this was not approved.
Page 47	Page 49
1 MR. FRISK: Sure. 2 MS. STANLEY: -- ten-minute one. 9:42 3 so 9:50? 4 MR. FRISK: Yeah, I'm good. 5 MS. STANLEY: Okay. 6 (Off the record from 9:42 a.m. to 7 10:03 a.m.) 8 Q. (Ms. Stanley continuing) You had 9 mentioned something about SBA loans and talking to 10 Martin about SBA loans; correct? 11 A. Yes. 12 Q. And you thought that was -- what did 13 you think that was for again? 14 A. The EIDL I believe it was. 15 Q. The EIDL loans -- 16 A. Yes. 17 Q. -- the emergency ones? 18 A. Yes. 19 Q. I'm going to give you -- let's mark 20 this as... Well, hang on. Let me make sure I got 21 the right one. Exhibit 29. 22 (Whereupon, Deposition Exhibit 23 29 was marked for identification by the court reporter.) 24 MS. STANLEY: I just wrote 29 on that 25 for you. Do you want one too, Dan?	1 The SBA kicked it back. 2 Q. The SBA what? 3 A. Kicked it back or -- 4 Q. Okay. 5 A. -- said it wasn't -- 6 Q. But did you apply for this? 7 A. -- eligible or something like that. 8 Yes -- 9 Q. Okay. 10 A. -- I do recognize this under direction of Martin. 12 Q. And it indicates this was for working capital; is that right? In the middle there, 14 "Purpose of the loan." 15 A. That's what Martin put in, yes. 16 Q. Okay. And was that working capital for your Mindy Photography business or was this for 18 construction of the Watertown projects? 19 A. Is there another page that goes with 20 this? Because I believe it had -- there was one for 21 Mindy Craig Photography. 22 MR. FRISK: And I'll just object to the form. It calls for speculation. She can't find 24 the first page. 25 A. Truly I don't recall what the purpose
	13 (Pages 46 - 49)

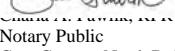
<p>1 was. You'd have to ask Martin.</p> <p>2 Q. (Ms. Stanley continuing) So you signed 3 it, but you don't recall what the purpose was for?</p> <p>4 A. Not off the top of my head.</p> <p>5 Q. And that's your signature though on 6 page -- I believe it's page 5.</p> <p>7 A. Yes.</p> <p>8 Q. And do you see on page 5 that...</p> <p>9 A. Yep, you can go ahead.</p> <p>10 Q. You're on page 5?</p> <p>11 A. Yep, page 5.</p> <p>12 Q. Okay.</p> <p>13 A. The signature page?</p> <p>14 Q. Yep.</p> <p>15 A. Yep.</p> <p>16 Q. Do you see where it has the 17 Representations section at the top?</p> <p>18 A. Yes.</p> <p>19 Q. And does it say, "All SBA loan proceeds 20 will be used only for business related purposes as 21 specified in the loan application"?</p> <p>22 A. Yes.</p> <p>23 MR. FRISK: You're asking her if she 24 sees that on page 5?</p> <p>25 MS. STANLEY: Yes.</p>	<p>Page 50</p> <p>1 wasn't sure if this was for the photography business 2 or not, and it clearly doesn't have the page on it. 3 You can answer to the extent you remember.</p> <p>4 A. The extent of what I recall was that 5 Martin put together the application, and what it was 6 for -- to be used for says working capital. That's 7 the extent of what I recall.</p> <p>8 Q. And you -- you recall signing it?</p> <p>9 A. Yes, I believe so.</p> <p>10 MS. STANLEY: Let's mark this one as 11 30.</p> <p>12 (Whereupon, Deposition Exhibit 30 was marked for identification by the court reporter.)</p> <p>13 Q. (Ms. Stanley continuing) I'll give it 14 to you. Make sure you put that one --</p> <p>15 A. Yes.</p> <p>16 Q. -- back together. Okay. You are 17 looking at Exhibit 30; correct?</p> <p>18 A. Yes.</p> <p>19 Q. And if you look at page 2, is this for 20 a -- the amount of loan request on this one indicates 21 1,652,500?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And does that again indicate the 24 purpose of the loan was for working capital?</p>
<p>1 Q. (Ms. Stanley continuing) And you're 2 not looking at page 5. This is page 5.</p> <p>3 A. Yes, I do see that.</p> <p>4 Q. Okay. And can you read the Accuracy 5 Certification section on page 5, please?</p> <p>6 A. I certify -- certify that the 7 information provided in this application and the 8 information I have provided in all supporting 9 documents and forms is true and accurate. I realize 10 that the penalty for knowingly making a false 11 statement to obtain a guaranteed loan from the SBA is 12 that I may be fined up to \$250,000 and/or be put in 13 jail for up to 5 years under 18 USC 1001; under 15 14 USC 645 by imprisonment of not more than two years 15 and/or a fine of not more than 5,000; and, if false 16 statements are submitted to a Federally insured 17 institution, I may be fined up to 1 million and/or be 18 put in jail for up to 30 days under 18 USC 1014.</p> <p>19 Q. So you -- I just want to confirm. You 20 made this application --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- but you don't know the reason for 23 it?</p> <p>24 MR. FRISK: Objection as to form.</p> <p>25 Mischaracterizes her testimony. She already said she</p>	<p>Page 51</p> <p>1 A. Yes.</p> <p>2 Q. And did you -- is this your signature 3 on page 5?</p> <p>4 A. Appears to be.</p> <p>5 Q. Okay. Do you know on this one what the 6 purpose of the loan was for?</p> <p>7 A. Just by the page 2 stating working 8 capital.</p> <p>9 Q. And you submitted this application for 10 SBA funds; correct? Or gave permission for Martin 11 Peterson to submit it?</p> <p>12 A. I don't recall this one.</p> <p>13 Q. You recall the one that we just looked 14 at?</p> <p>15 A. I recall filling out an application for 16 an SBA, but I don't recall multiples.</p> <p>17 Q. You only recall one?</p> <p>18 A. One.</p> <p>19 Q. And you don't -- do you remember the 20 amount of the one that was submitted?</p> <p>21 A. I think it was this first one.</p> <p>22 Q. The 1.6?</p> <p>23 A. Point 4.</p> <p>24 Q. Oh, the first one was Exhibit 29, 25 1.477?</p>

<p>1 A. Yep, I don't remember -- I believe that 2 was -- well, judging by the dates that was the first 3 one. The amounts, I -- I couldn't attest to you. I 4 just remember filling out one application.</p> <p>5 Q. Okay. If we look on page 6, does that 6 look like your handwriting?</p> <p>7 A. Appears to.</p> <p>8 Q. And then page 8, again the 9 representations, acknowledgments and authorizations?</p> <p>10 A. Appears to.</p> <p>11 MR. FRISK: On 8? You mean 8?</p> <p>12 MS. STANLEY: Yes, there's a signature 13 page on page 8.</p> <p>14 MR. FRISK: Oh, I thought you said 6.</p> <p>15 MS. STANLEY: There's one on 6 as well. 16 Or not -- there's writing on page 6.</p> <p>17 MR. FRISK: Oh.</p> <p>18 MS. STANLEY: Not signature but 19 initials. All right. And let's do one more. This 20 is 31?</p> <p>21 THE REPORTER: Correct. (Whereupon, Deposition Exhibit 31 was marked for identification by the court reporter.)</p> <p>24 Q. (Ms. Stanley continuing) And I notice 25 you're looking at the exhibits --</p>	<p>Page 54</p> <p>1 other ones were very specifically clear. These ones 2 are very -- not.</p> <p>3 MR. FRISK: Well, just let the record 4 reflect that Exhibit 29 and 30 and 31 were 5 photocopies. We don't have the originals.</p> <p>6 MS. STANLEY: That's true. They're not 7 here today.</p> <p>8 Q. (Ms. Stanley continuing) Please look at 9 page 8. Does that appear to be your signature?</p> <p>10 A. Appears to, but again it looks odd.</p> <p>11 Q. It looks like it's been photocopied 12 multiple times --</p> <p>13 A. Yeah.</p> <p>14 Q. -- is that correct?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. Do you have any recollection of 17 making this request for an SBA loan in that sum of 18 \$1.321 million?</p> <p>19 A. That does not ring a bell to me.</p> <p>20 Q. And this one indicates the purpose of 21 the loan was for working capital again; is that 22 correct?</p> <p>23 A. That is what the paperwork states.</p> <p>24 Q. Would there be any reason that Mindy 25 Photography would need loans in these amounts?</p>
<p>1 A. Yeah --</p> <p>2 Q. -- for --</p> <p>3 A. -- I'm looking at my signature and I'm 4 also looking at the dates to see if they coordinate, 5 are the same, if it would have been all in one time 6 when the signing. And even just jogging my memory as 7 to what the world...</p> <p>8 Q. Here's Exhibit 31. Just make sure I 9 got the right numbers. Here's 31. And if you look 10 on page 2 of 31, does this appear to be a loan 11 request -- SBA loan request from Mulinda Sue Craig in 12 the sum of \$1,321,100?</p> <p>13 A. Yes.</p> <p>14 Q. And if you look on page 5, does that 15 appear to be your signature?</p> <p>16 A. It does appear, but it looks like it 17 was either transferred -- it doesn't look like a wet 18 signature so I'm not sure. It's not as clear as the 19 other ones so I don't know.</p> <p>20 Q. Okay. Let's look at page 6. Does that 21 appear to be your writing on page 6?</p> <p>22 A. Yeah, again it almost looks like it was 23 transferred. Not as clear as the other ones.</p> <p>24 Q. So --</p> <p>25 A. It appears to be my initialing, but the</p>	<p>Page 55</p> <p>1 A. No. Is there a business tax ID on any 2 of them --</p> <p>3 Q. Not that I have seen.</p> <p>4 A. -- that the bank has?</p> <p>5 Q. No.</p> <p>6 A. 'Cause the bank would have the 7 originals of these; correct?</p> <p>8 Q. (Indicating.)</p> <p>9 A. And in the loan file is there any 10 documentation --</p> <p>11 Q. If there was --</p> <p>12 A. -- as to what it's for?</p> <p>13 Q. My understanding of the forms is -- if 14 you look at page 9, that is where if it was on behalf 15 of an entity that would be filled out. But that's 16 just my understanding of the forms. So would -- 17 would you have submitted loan applications for these 18 amounts on behalf of Mindy Photography?</p> <p>19 A. Not for these amounts, no.</p> <p>20 Q. Was there any other business you would 21 have submitted these on behalf of?</p> <p>22 A. No. The PPP was for Mindy Craig 23 Photography, and I believe CP Business Management 24 also got one.</p> <p>25</p>

	Page 58	Page 60
1	(Whereupon, Deposition Exhibit 32 was marked for identification by the court reporter.)	1 that Jesse doing that or, I mean, who -- who rides 2 the horses?
2		3 A. Our daughters.
3	Q. (Ms. Stanley continuing) Handing you 4 what's been marked as Exhibit 32, and can you 5 identify what this document is? Oh, sorry.	4 Q. The younger twins?
6	A. It is a check from Craig Development 7 for \$600.	5 A. Yes.
8	Q. Made out to who? I can't...	6 Q. Okay. Both of them?
9	A. Brady Punt.	7 A. Yes.
10	Q. P-u-n-t?	8 Q. Do you ride horses?
11	A. Yes.	9 A. No.
12	Q. Is this your handwriting?	10 Q. Does Jesse ride horses?
13	A. Yes.	11 A. He does not.
14	Q. What is -- who's Brady Punt?	12 (Whereupon, Deposition Exhibit 33 was marked for identification by the court reporter.)
15	A. Was a horse trainer, owner.	13
16	Q. Who -- is this somebody that you used 17 as a horse trainer, owner?	14 MR. FRISK: Do you want to take -- you 15 guys want to take your midmorning right now and let 16 me run over?
18	A. No.	17 MS. STANLEY: You need to run? Okay.
19	Q. Who -- why would Craig Development make 20 a payment for \$600 to Brady Punt?	18 (Off the record from 10:23 a.m. to 19 10:57 a.m.)
21	A. Good question. As Jesse stated 22 yesterday, he uses the 824 out of the Craig 23 Development checking in the Yardi system --	20 MS. STANLEY: It is 10:57. We're back 21 on the record. Mr. Frisk hurried back from a 22 scheduling conference so thank you for hurrying back.
24	Q. Uh-huh.	23 Q. (Ms. Stanley continuing) I'm handing 24 you what's been marked as Exhibit 33. Is that your 25 handwriting on Exhibit 33?
	Page 59	Page 61
1	have been one of those instances.	1 A. Yes.
2	Q. And you wrote the check out though?	2 Q. And can you identify the document?
3	A. It looks like I did.	3 A. It's a check from Craig Development for
4	Q. Can you recall other instances where --	4 \$9,000.
5	or did you not indicate you were not authorized or	5 Q. And made out to...?
6	are you authorized to write on the Craig Development	6 A. I think it's Nichole Mathison.
7	account?	7 Mathiason.
8	A. I may have been back then. I'm not	8 Q. And it looks like it says "3 saddles"
9	currently now to my knowledge. And if they didn't	9 to me. Is that right?
10	kick it back, I must be or must have been.	10 A. Yes.
11	Q. Well, is that your -- I mean, is that	11 Q. Okay. Does this ring any bells?
12	how you sign? The authorized signature, is that you	12 A. Vaguely.
13	signing in your name or is that you signing Jesse's	13 Q. And was that -- so the authorized
14	name?	14 signature, is that you signing your name or are you
15	A. That's me signing mine.	15 signing Jesse's name?
16	Q. That's your --	16 A. My name.
17	A. -- signature. But it's shortened over	17 Q. Okay. So you were authorized to write
18	the years.	18 this check?
19	Q. Okay. Do you recall making other	19 A. I believe this is the same time frame
20	payments out of the Craig Development account?	20 as Exhibit 32. And at the time I may have had
21	Writing other checks I should say.	21 signature authority. I can't recall. The bank
22	A. If I did, it would have been Jesse	22 didn't kick it back so I must have.
23	handing me a check for whatever the case may have	23 Q. Did you remove yourself from having
24	been.	24 signatory authority?
25	Q. So are the -- the horse interaction, is	25 A. No. No, not that I recall. I just

1 can't recall how the checking account was set up 2 initially. I don't recall. 3 Q. Do you have recollection of any other 4 checks that you may have written for Craig 5 Development or Craig Properties? 6 A. In what time frame? 7 Q. In 2020 to 2024. 8 A. Yes. I don't know about Craig 9 Properties though. Craig Development, yes. Craig 10 Properties, I don't believe there should have been 11 any on Craig Properties. I wouldn't have access to 12 that check -- or a check blank at all. 13 Q. And I think earlier -- just remind me. 14 Earlier I think you testified that you don't recall 15 ever getting payments to you from either Craig 16 Development or Craig Properties. To you in your 17 individual capacity. 18 A. You asked for Craig Properties -- 19 Q. Okay. 20 A. -- not Craig Development. 21 Q. Did you -- in that time frame of 2020 22 to '24 did you receive funds from Craig Development? 23 A. Yes. 24 Q. What was the purpose? 25 A. Multitude of reasons. To pay down the	Page 62 1 their account is set up, but there's different 2 subcategories. I don't know if it's a Craig 3 Properties heading or if it's a Craig Development 4 heading or if it's just a Craig heading. I don't 5 know. 6 Q. Uh-huh. Okay. 7 A. And then all the different 8 subcategories for the different checking accounts, 9 entities, buildings, bank account, all of it. And 10 same thing for CP Business Management. 11 Q. So is there like two -- two licenses? 12 A. Uh-huh. 13 Q. One for -- 14 A. Yes. 15 Q. Okay. And is Jesse the only one who 16 has access to the Craig one, Craig Properties, Craig 17 Development one? 18 A. Jordan would also have access. And I 19 believe anyone that she's had working under her over 20 numerous years may have had access. Just -- you can 21 limit certain aspects and scopes to just seeing 22 maintenance, just seeing tenants, just seeing bank 23 account information, just seeing financials, all 24 that. 25 Q. Okay. Interesting. So I -- you said I
1 car loans. To -- or -- yes, pay down car loans, but 2 like they're monthly payments. Reimbursement for 3 random expenses. I mean, it all -- like I said, if 4 anything, it went through the 824 account. So it was 5 in our Yardi system. Or Jesse's part of the Yardi 6 system. 'Cause we have two different ones. It would 7 all be tracked in there as to what it was for, how 8 much or whatnot. 9 Q. Is the Yardi system -- you have this 10 for both Craig Development and Craig Properties? 11 A. We have two separate systems, 12 completely separate systems. It's -- yes, it's Yardi 13 software, but there are two logins, there two -- they 14 don't cross over at all. I don't have it on my 15 computer. I don't have access to it. And likewise 16 for CP Business Management, Craig Development doesn't 17 have a login or access to it. 18 Q. So the Yardi software is used for 19 Craig -- CP Business -- 20 A. Yes. 21 Q. -- correct? 22 A. Yes. 23 Q. Okay. And it's also used for Craig 24 Properties? 25 A. Craig Properties, I don't know how	Page 63 1 had asked you about Craig Properties -- 2 A. Correct. 3 Q. -- and that you had not received any 4 funds from Craig Properties to your recollection. 5 A. Not that I can recall. 6 Q. Okay. And then just to clarify. You 7 have received funds though from Craig Development? 8 A. Yes. 9 Q. And they were during that time period 10 of 2020 to 2024? 11 A. Would have been vehicle payments that 12 get written out to me, and then they come out of my 13 bank account as auto payments. And then just like I 14 said random personal expenses. I don't even -- I 15 couldn't even tell you what else. 16 Q. But you weren't -- 17 A. Is there something specific that you're 18 asking -- 19 Q. Well, you -- 20 A. -- that I can help? 21 Q. -- you weren't doing any work for Craig 22 Development; right? 23 A. No. 24 Q. So these were gifts? 25 MR. FRISK: Objection to form. She's

1 previously testified that the nature of these were 2 just personal expense reimbursements, not gifts, and 3 that's -- that would have legal connotations if they 4 were not -- if they were gifts. We know what they 5 were. They were just reimbursements for stuff. 6 Q. (Ms. Stanley continuing) Well, when 7 you say reimbursements for stuff, were they things 8 that you had paid on behalf of Craig Development that 9 you are asking for it to reimburse you? 10 A. No. It would have been Jesse paying 11 for whatever the item was that maybe I personally 12 paid for. It went on my credit card or my debit card 13 or whatever the case may have been. 14 Q. So were these things to benefit Craig 15 Development or to benefit Jesse in his individual 16 capacity? 17 MR. FRISK: Objection as to form. 18 She's previously testified that there's a subcategory 19 of personal expenses that Jesse uses his account for. 20 Go ahead and answer to the extent you can. And I 21 don't remember what the question was so... 22 A. A little bit of both. I can't recall 23 anything specifically off the top of my head to give 24 as an example for Craig Development specifically 25 paying for versus Jesse Craig and the 824 out of the	Page 66	1 Q. Made out to...? 2 A. Crown Jewels. 3 Q. And it's dated it looks like June 29th 4 of 2022. 5 A. Yes. 6 Q. Did you receive any jewelry on this 7 date, on or about this time from Jesse? 8 A. I don't believe so. 9 Q. Are you aware of any jewelry purchases 10 by Jesse around this time for anything else? 11 A. You would have to ask him specifically. 12 I know that he helped his now son-in-law with some 13 jewelry, but I don't know -- 14 Q. Like buying -- 15 A. -- a date. 16 Q. -- buying jewelry for -- 17 A. Yes. 18 Q. -- other people? 19 A. Yes. 20 Q. Is this Jesse's signature? 21 A. Yes. 22 Q. Are you aware of other personal 23 expenses similar to this coming out of the Craig 24 Development, LLC account? 25 A. I would not be aware. I couldn't tell	Page 68
1 Craig Development account paying for. Even some 2 random things in Watertown, the lake home. I can't 3 recall specifically. 4 Q. (Ms. Stanley continuing) So is 824 5 the -- like the accounting number for Craig 6 Development? 7 A. 824 is a... 8 Q. Like the Yardi number or something? 9 A. Yeah. Yes -- 10 Q. Okay. 11 A. -- would be the best I guess, the 12 terminology for that. 13 Q. What's the one for Craig Properties? 14 A. That one I don't -- I don't know. I 15 don't know how Craig Properties subcategorizes 16 anything. 17 Q. Do you... 18 MS. STANLEY: Well, let's mark this 19 one. This is...? 20 THE REPORTER: 34. 21 (Whereupon, Deposition Exhibit 34 was marked for identification by the court reporter.) 23 Q. (Ms. Stanley continuing) I'm giving you Exhibit 34. Can you identify this document? 25 A. It's a Craig Development check.	Page 67	1 you. 2 MS. STANLEY: I have no further 3 questions. 4 MR. FRISK: We'll read and sign. And 5 then I think Mac's office gets a -- wants a copy. 6 MS. CATHCART: Yeah. 7 MR. FRISK: I don't necessarily. I 8 don't need a copy. 9 (Whereupon, the deposition of MULINDA 10 CRAIG was concluded at 11:07 a.m.) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	Page 69

<p>1 REPORTER'S CERTIFICATE 2 3 STATE OF NORTH DAKOTA) 4) 5 COUNTY OF CASS) 6 7 I hereby certify that I reported the deposition of MULINDA CRAIG on September 24, 2025, at the Vogel Law Firm, Fargo, North Dakota, and that the witness was by me first duly sworn to tell the whole truth; 8 That the testimony was transcribed by me and is a true record of the testimony of the witness; 9 That the cost of the original has been charged to the party who noticed the deposition, and that all parties who ordered copies have been charged at the same rate for such copies; 12 That I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel; 14 That I am not financially interested in the action and have no contract with the parties, 15 attorneys or persons with an interest in the action that affects or has a substantial tendency to affect 16 my impartiality; 17 That the right to read and sign the deposition transcript by the witness was reserved. 18 WITNESS MY HAND AND SEAL THIS 26th day of 19 September, 2025. 20 21  22 _____ 23 Notary Public 24 Cass County, North Dakota My commission expires September 4, 2026. 25</p>	<p>Page 70</p> <p>1 DEPOSITION REVIEW 2 CERTIFICATION OF WITNESS 3 4 ASSIGNMENT REFERENCE NO: 7619968 5 CASE NAME: Generations On 1St LLC, Et Al v. 6 DATE OF DEPOSITION: 9/24/2025 7 WITNESS' NAME: Mulinda Craig 8 In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. 9 I have made no changes to the testimony as transcribed by the court reporter. 10 _____ 11 Date _____ Mulinda Craig 12 Sworn to and subscribed before me, a Notary Public in and for the State and County, 13 the referenced witness did personally appear and acknowledge that: 14 They have read the transcript; 15 They signed the foregoing Sworn Statement; and 16 Their execution of this Statement is of their free act and deed. 17 I have affixed my name and official seal 18 this _____ day of _____, 20_____. 19 _____ 20 Notary Public 21 _____ 22 Commission Expiration Date 23 24 25</p>
<p>1 Veritext Legal Solutions 2 1100 Superior Ave 3 Suite 1820 4 Cleveland, Ohio 44114 5 Phone: 216-523-1313 6 September 26, 2025 7 To: Maurice VerStandig 8 Case Name: Generations On 1St LLC, Et Al v. 9 Veritext Reference Number: 7619968 10 Witness: Mulinda Craig Deposition Date: 9/24/2025 11 Dear Sir/Madam: 12 Enclosed please find a deposition transcript. Please have the witness 13 review the transcript and note any changes or corrections on the 14 included errata sheet, indicating the page, line number, change, and 15 the reason for the change. Have the witness' signature notarized and 16 forward the completed page(s) back to us at the Production address 17 shown 18 above, or email to production-midwest@veritext.com. 19 If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived. 20 21 Sincerely, 22 Production Department 23 24 25 NO NOTARY REQUIRED IN CA</p>	<p>Page 71</p> <p>1 DEPOSITION REVIEW 2 CERTIFICATION OF WITNESS 3 4 ASSIGNMENT REFERENCE NO: 7619968 5 CASE NAME: Generations On 1St LLC, Et Al v. 6 DATE OF DEPOSITION: 9/24/2025 7 WITNESS' NAME: Mulinda Craig 8 In accordance with the Rules of Civil Procedure, I have read the entire transcript of my testimony or it has been read to me. 9 I have listed my changes on the attached Errata Sheet, listing page and line numbers as well as the reason(s) for the change(s). 10 I request that these changes be entered as part of the record of my testimony. 11 I have executed the Errata Sheet, as well 12 as this Certificate, and request and authorize that both be appended to the transcript of my testimony and be incorporated therein. 13 _____ 14 Date _____ Mulinda Craig 15 Sworn to and subscribed before me, a 16 Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that: 17 They have read the transcript; 18 They have listed all of their corrections in the appended Errata Sheet; 19 They signed the foregoing Sworn Statement; and Their execution of this Statement is of their free act and deed. 20 I have affixed my name and official seal 21 this _____ day of _____, 20_____. 22 _____ 23 Notary Public 24 _____ 25 Commission Expiration Date</p>

<p>1 ERRATA SHEET 2 VERITEXT LEGAL SOLUTIONS MIDWEST 3 ASSIGNMENT NO: 7619968 4 PAGE/LINE(S) / CHANGE /REASON 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____</p> <p>20 Date _____ 21 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____. 22 DAY OF _____, 20 _____. 23 _____ 24 Notary Public 25 Commission Expiration Date</p>	
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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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